

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

DIEGO PAVIA,

Plaintiff,

v.

**NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,**

Defendant.

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Case No. 3:24-cv-01336

Judge William L. Campbell, Jr.

DECLARATION OF CLARK LEA


I, Clark Lea, declare as follows:

1. I am the head football coach at Vanderbilt University ("Vanderbilt").
2. Diego Pavia is currently a team captain and the starting quarterback for Vanderbilt's football team.
3. As a college football coach, I am recruiting players year-round and have recruits on campus every week of the Fall season. I plan my roster far in advance of each season and the team's starting quarterback is a key component of the roster. Just like every other Division I head football coach, I am already thinking about who Vanderbilt's quarterback will be next year and recruiting both quarterbacks and other offensive players to complement that position.
4. Based on my understanding of current NCAA Bylaws, Diego Pavia will not have any years of eligibility left to play football at Vanderbilt after this season because he previously played football in junior college. Accordingly, I am currently planning Vanderbilt's roster for next year assuming he will not be a part of it.
5. Diego is a strong leader and great player for the Vanderbilt program and I would love to have him back next year. However, I cannot leave the team and program in limbo while

an extended legal process plays out for Diego. Unless and until Diego gets a court ruling in his favor, I must proceed with building a roster without him. At some point before the end of this year, we will lock in the quarterbacks we expect on Vanderbilt's roster for 2025 and it will become very difficult for us to bring Diego back even if he later obtains relief from a court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 7, 2024


Clark Lea